

Jessica Stebbins Bina
Direct Dial: (424) 653-5525
jessica.stebbinsbina@lw.com

10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Tel: +1.424.653.5500 Fax: +1.424.653.5501
www.lw.com

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VIA ECF

November 2, 2020

Hon. Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall U. S. Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Doe et al v. The Trump Corporation et al.*
Case No. 18-cv-9936

Dear Judge Schofield:

Rachel Bosley is an attorney who has joined the Los Angeles office of Latham & Watkins LLP (hereinafter “Latham & Watkins”) from the United States District Court, Southern District of New York, where she was a Law Clerk in your chambers. During her clerkship, Ms. Bosley worked personally and substantially on the above-captioned matter.

As required by Rule 1.12(c) of the Rules of Professional Conduct of the State Bar of California, I am writing to notify the Court and the parties in this case that all lawyers affiliated with Latham & Watkins have been informed that Ms. Bosley has been screened from participating in or discussing this matter, and shall be apportioned no part of the fee earned therefrom, if any. Specifically, the following procedures have been taken to screen Ms. Bosley:

The central file index to all files, documents, and records in this matter has been marked to indicate that Ms. Bosley is to be denied access thereto, and her access to any such electronic files, documents, or records has been electronically restricted in the document management software system.

A memorandum has been circulated instructing all personnel that Ms. Bosley is not to have access to any of the files, documents, or records in this matter, and that Ms. Bosley is neither to advise nor consult with any attorney or other person with respect to any aspect of this matter.

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Ms. Bosley will not share in any of the fees for this matter.

Respectfully submitted,

/s/ Jessica Stebbins Bina
Jessica Stebbins Bina (*pro hac vice*)
of LATHAM & WATKINS LLP

Cc: All Counsel of Record (via ECF)